

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
)	
GIUSEPPE MAROTTA et al.,)	
)	
Plaintiff)	
)	
v.)	C.A. NO. 05-10032-MEL
)	
SUFFOLK COUNTY,)	
Defendant)	
_____)	

**ASSENTED TO MOTION TO ENLARGE DEADLINES ESTABLISHED
BY JOINT MANAGEMENT PLAN**

Now come the parties to the above-referenced action, and in the related action, *Brown v. Suffolk County*, 05-10188-MEL, move to enlarge all deadlines established by the scheduling order. In support thereof, due to an unexpected death in the immediate family of counsel for the Plaintiffs, counsel for the Plaintiffs was forced to take an unexpected leave from his practice, and was unable to engage in the litigation of this action. In light of these circumstances, Counsel for the Defendant has assented to this Motion.

The parties propose that the deadlines be enlarged as follows:

- Fact Discovery to be completed by March 30, 2007;
- Dispositive Motions to be filed by April 30, 2007;
- Disclosure of Experts by May 30, 2007;
- Trial, July 1, 2007.

Respectfully submitted,

THE PLAINTIFFS

By their attorney,

s/Daniel W. Rice

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THE DEFENDANT

By its attorney,

s/Russell Homsy

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Dated: January 26, 2006